

A-G7 9 @B9CI G'H9LH'fl 97 : cfa ' - - L

PAGE 1 / 2

We are responding to the letter dated May 10, 2013, which asks about the timeliness of reports of independent expenditures reflected on Workers? Voice?s amended October 2012 Quarterly Report that comprise 8.4% of the total amount of independent expenditures reported by Workers? Voice for that period.

Workers? Voice submitted 48-hour reports almost every day from August 25 through September 30, 2012 (and then 48-hour or 24-hour reports every day from October 1 to November 5, 2012). Specifically with respect to the July-September quarter covered by the amended October Quarterly Report, the Workers? Voice independent expenditures that are itemized in the attachment to your letter were incurred entirely in connection with door-to-door canvassing in five states (Florida, Nevada, Ohio, Pennsylvania and Wisconsin). This canvassing was carried out on behalf of Workers? Voice by a combination of volunteers and individuals who were employed by other organizations. The paid time and associated expenses of the employed individuals were provided to Workers? Voice as in-kind contributions from numerous federal political committees, nonfederal political organizations and labor organizations.

In order to comply with the Commission?s rules and guidance with respect to reporting in-kind contributions received and independent expenditures made, every such in-kind contribution received was matched with a corresponding Workers? Voice expenditure, which was often, but not always, an independent expenditure that usually, but not always, was required to be included on a 48-hour or 24-hour report. When it was so included it was reflected as an expenditure to its in-kind source, so that the Workers? Voice Form 3X would balance as required. Workers? Voice timely reported every independent expenditure about which it then had information with respect to the receipt of an in-kind contribution and its corresponding expenditure. Workers? Voice attributed to particular independent-expenditure communications the value of the in-kind resources that were used for that expenditure, using the figures provided to Workers? Voice by the in-kind contributors of the personnel and other resources that were deployed. Workers? Voice credited these in-kind amounts to the respective dates when they were deployed to disseminate Workers? Voice?s independent-expenditure communication.

Workers? Voice devised an internal system to account for these in-kind receipts and to associate them with Workers? Voice independent expenditures and other activities, and it worked closely with each of its in-kind contributors to amass the requisite in-kind contribution information from them in a timely manner. This system, and Workers? Voice?s overall method of operation, which entailed the absorption of considerable in-kind resources in multiple states and races, sometimes experienced the provision by an in-kind contributor and the receipt by Workers? Voice of information about the nature, value and timing of in-kind resources that were received and deployed that was too late to include in the appropriate 48-hour or 24-hour report. When Workers? Voice received such late information, it either or both amended the relevant 48-hour (or 24-hour) report and included the information on its regularly scheduled Form 3X that covered the period at issue. The October Quarterly Report was amended three times, including since we received your letter, in order to conform it to late-received information.

The only independent expenditures on the attachment to your letter that were not included in the in-kind contributions and expenditures described above were expenditures to three vendors: Lexicon (design), Colleen O?Neill (proofreading) and Mosaic (printing). These were reported on the October Quarterly Report but not on 48-hour reports due to late billing by the vendors of the associated charges and, so, late attribution of specific portions of the

A-G7 9 @ @ B9CI G'H9LH'fl 97 : cfa ' - - L

PAGE 2 / 2

bills to
particular independent expenditures.

We understand from a subsequent telephone conversation with you that your office does not request that Workers? Voice further amend its 48-hour or 24-hour reports that were submitted during 2012, although we are prepared to do so upon request.
